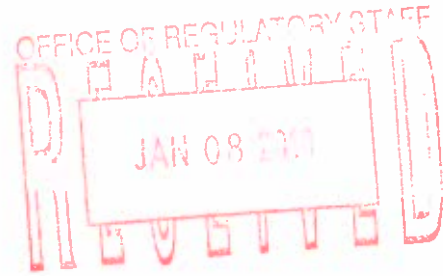


January 4, 2018

The Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia SC. 29201



REQUEST FOR PUBLIC HEARING IN BEAUFORT COUNTY, SOUTH CAROLINA IN DOCKET 2017-292-WS

PROTESTANT INFORMATION:

Jennifer Keenan
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Please consider this my request for a local public hearing to be held in Beaufort SC.

Section 1. What is my connection or interest in this case?

My company, Dancing Dolphin Properties LLC owns and manages the following duplexes:-

3A/B Adams Circle
5A/B Adams Circle
11A/B Adams Circle

All duplex units are Beaufort, SC. 29902

Each unit is separately metered for water by BJWSA.

Section 2. Please give a concise state of your protest.

Carolina Water Service, Inc. AKA Utilities Inc., has owned and operated the sewer system to the above duplexes since the mid-1980s. During that time bills escalated to over \$90/month due to flawed infrastructure that allows water intrusion, especially during rains and floods. The water flowing through the system goes through one meter owned and operated by Beaufort Jasper Sewer and Water Authority. The metered water does not reflect the usage by the occupants of the duplexes but rather the intrusion of water. This was brought to CWS's attention around the end of 2015 by myself and other owners and property managers. PSC was contacted over this situation. Fran Heckrotte of Orphan Homes and I met with UTI representatives and was told that they had petitioned PSC. The units would be charged a flat fee per month in 2016. That flat fee was \$52.93 but it wasn't per month. It was put on an 'accelerated' schedule of 25/26 days which meant UTI was getting 13 payments per year. When UTI was questioned about this in 2017 we were told that it was to catch-up on delayed bills prior to the flat rate change and

it would stop once bills were current. To date, UTI is still on an accelerated billing rate. We have been informed by Mr. Cartin that they will be going to a 30/31cycle in 2018.

My complaint is that since UTI was playing catch-up by charging that 13th bill per year, they have been collecting an extra \$52.93 per year per unit. That extra \$52.93 could now be divided by 12 and added to the \$52.93 'true' monthly billing. They would then collect \$57.34/mo increasing their margin by \$4.41 per month per unit since all past due bills are current, now. An increase to \$69.76 is unreasonable since UTI still has not resolved their infra-structure problem. Tenants/owners are still subsidizing UTI for the water intrusion issue. Tenants and owners should not be the ones carrying this burden.

Finally, each unit has its own water meter, therefore, BJWSA can provide the actual water usage of the occupants. They should be billed on that usage alone. The only fair way to do this is for BJWSA to bill UTI for each unit's usage and UTI bill each unit based on that. Were that to happen, then I am sure UTI would have more incentive to correct the infrastructure issues. During my meetings with the UTI representatives in early 2016, Ms. Heckrotte and I were told by one rep that it was cheaper to factor in a 'percentage of loss' and deduct that from the occupant bills than spend millions rebuilding/repairing the existing system. While that is true, it should not be the tenant/owners that continue to bear the water intrusion burden.

UTI should not be rewarded by the rate increase they are asking. The \$57.34 increase is reward enough.


Section 3: Do you wish to make an appearance at a hearing in this proceeding?

I believe I have stated my case clearly, All information is verifiable by UTI billings. I do not wish to travel hours to repeat this information.

I request that the Commission hold a public hearing in the county of Beaufort SC in order to hear comments and will also be making this request under separate cover to the Office of Regulatory Staff and Carolina Water Service.

Thank you for your attention.

Your faithfully



Jennifer Keenan
Dancing Dolphin Properties